

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Woodstone Limited Partnership;  
Lofts at Farmers Market LLC,

Case No. 22-CV-1589 NEB-JFD

Plaintiffs,

v.

City of Saint Paul, Minnesota, a Minnesota  
Charter City; City Council of the City of  
Saint Paul; Angie Wiese, in her official  
capacity as the Director of the Department  
of Safety and Inspections of the City of  
Saint Paul; Mayor Melvin Carter, in his  
official capacity as Mayor of the City of  
Saint Paul; and John Doe,

Defendants.

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**JOINT REQUEST FOR PERMISSION  
TO FILE EARLY SUMMARY  
JUDGMENT MOTIONS AND  
STIPULATION FOR MOTION  
PROCEDURE**

WHEREAS, on July 26, 2022, the parties/counsel identified below conferred as required by Fed. R. Civ. P. 26(f) and the Local Rules;

WHEREAS, at the July 26, 2022 conference, the parties agreed that, with limited discovery, early summary judgment motions would be appropriate;

WHEREAS, on August 11, 2022, Plaintiffs filed a letter with the Court, requesting permission to file an early summary judgment motion;

WHEREAS, since August 11, 2022, Defendants have agreed to jointly request permission to file early summary judgment motions, and the parties have discussed and agreed to procedures for briefing and hearing early summary judgment motions, as outlined below;

WHEREAS, Judge Brasel's Practice Pointers and Preferences state that "[p]arties may not file a motion for summary judgment prior to the discovery deadline unless they have received special permission from the Court"; and

WHEREAS, the parties jointly seek the Court's permission to file cross motions for summary judgment according to the following procedures.

The parties stipulate and agree as follows:

1. On or before September 12, 2022, Defendants will provide all information and documents responsive to the discovery requests served by Plaintiffs on August 12, 2022.

2. On or before October 17, 2022, Plaintiffs will file their motion for summary judgment.

3. On or before November 7, 2022, Defendants will file their combined motion for summary judgment and response to Plaintiffs' motion for summary judgment.

4. On or before November 28, 2022, Plaintiffs will file their combined reply in further support of their motion for summary judgment and response to Defendants' motion for summary judgment.

5. On or before December 12, 2022, Defendants will file their reply in further support of their motion for summary judgment.

6. Plaintiffs' two briefs identified above shall not exceed 24,000 words combined, excluding the text identified in Local Rule 7.1(f)(1)(C). Defendants' two briefs identified above shall not exceed 24,000 words combined, excluding the text identified in Local Rule 7.1(f)(1)(C).

7. The parties will contact Judge Brasel's chambers to schedule a hearing date consistent with this schedule.

8. All other discovery and motion practice in this lawsuit, and all deadlines set forth in the Scheduling Order filed on August 17, 2022 (Dkt. 20), will be stayed until after the resolution of the parties' cross motions for summary judgment. If the parties' cross motions do not result in the complete and final resolution of this lawsuit, the parties will submit a Rule 26(f) Report to the Court and the Court will order a status conference to discuss scheduling the remainder of the lawsuit.

Dated: August 23, 2022

**ANTHONY OSTLUND LOUWAGIE  
DRESSEN & BOYLAN P.A.**

*s/ Philip J. Kaplan*

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**ATTORNEYS FOR PLAINTIFFS**

Dated: August 23, 2022

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